

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	NO. 2:22-CR-00352-NIQA-1
	:	
vs.	:	
	:	
LUIS TORRES	:	

**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, it is hereby  
**ORDERED** and **DECREED** that defendant's Motion for a Continuance of Trial is  
**GRANTED**.

**BY THE COURT:**

\_\_\_\_\_  
J.

***IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA***

UNITED STATES OF AMERICA	:	NO. 2:22-CR-00352-NIQA-1
	:	
vs.	:	
	:	
LUIS TORRES	:	

**MOTION FOR CONTINUANCE OF TRIAL**

***AND NOW***, the defendant, Luis Torres, by and through his attorney, Louis T. Savino, Jr., Esquire, does file the within Motion and avers as follows:

1. The defendant, Luis Torres, has retained the legal services of Louis T. Savino, P.C. to represent him in the above captioned criminal matter.
2. Trial in this matter is scheduled for November 28, 2022 before the Honorable Nitza I. Quinones, United States District Judge United States District Court for the Eastern District of Pennsylvania.
3. A 90 (ninety) day continuance of trial is respectfully requested as additional time is needed for further investigation and

preparation. Additionally, further time is also needed to engage in plea negotiations with the government in the hopes of achieving a non-trial disposition.

4. The Government, through its representative, Mary Crawley, Esquire, (AUSA) has no objection to the within request.
5. It is respectfully submitted that the case in its present posture is untriable. It is also respectfully submitted that the ends of justice in the defendant's need to continue the trial for preparation purposes outweigh the public interest in a speedy disposition of the within matter. See, 18 U.S.C. § 3161 et. seq.

**WHEREFORE**, for all of the foregoing reasons, it is respectfully requested that the within Motion be **GRANTED**.

Respectfully submitted,

By: 

**LOUIS T. SAVINO, ESQ.**  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

Louis T. Savino, Esquire being duly sworn according to law, deposes and says that on the 14<sup>th</sup> day of November, 2022 a copy of the within document was served upon the following individuals via electronically:

**Honorable Nitza I. Quinones**  
United States District Judge  
United States District Court for the  
Eastern District of Pennsylvania  
United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

**Mary Crawley, Esquire**  
Office of the United States Attorney  
Suite 1250  
615 Chestnut Street  
Philadelphia, PA 19106

Respectfully submitted,

By: 

**LOUIS T. SAVINO, ESQ.**  
Attorney for Defendant